

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION
Criminal No.: 22-CR-207 (JRT/ECW)**

United States of America,)	
)	
Plaintiff,)	DEFENDANT'S MOTION TO COMPEL
)	GOVERNMENT TO COPY AUDIO
Justin White,)	TAPES AND PROVIDE COUNSEL
)	WITH WRITTEN TRANSCRIPT
)	
Defendant.)	

Defendant, Justin White, by and through his attorney, James M. Ventura, respectfully moves the Court, pursuant to Rules 16(a)(1) and 16(b)(1) of the Federal Rules of Criminal Procedure, for an Order compelling the Government to provide a copy of all audio tapes, prison phone calls, and written transcripts of communications intercepted pursuant to wiretap in the above-entitled action.

This Motion is made upon the grounds that the Government can accomplish such copying or duplication much more efficiently and economically than defense counsel by virtue of their access to high-speed tape duplicating devices and copying machines; and that requiring counsel for Defendant White to perform such copying or duplicating would impose a substantial and unwarranted burden upon Defendant White.

This Motion is based upon the Indictment, the records, and files in the above-entitled action, and any and all matters which may be presented prior to, or at the time of the hearing of said Motion.

Dated: September 23, 2022

Respectfully submitted,

/s/ James M. Ventura

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